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7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**

9 HILLCREST INVESTMENTS, LTD., a
foreign corporation; HILLCREST
10 PROJECTS, LLC., a foreign limited liability
company;

11 Plaintiffs,

12 v.

13 CHICAGO TITLE INSURANCE
14 COMPANY, a foreign entity; QUAIL
VALLEY WATER DISTRICT, a foreign
15 entity; 11239, LLC, a foreign entity;
R.A.M.M. CORP., a Nevada Corporation;

16 Defendants.
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Case No. 2:22-cv-00406-RFB-VCF

**STIPULATION AND ORDER TO EXTEND
TIME FOR PLAINTIFF TO FILE RESPONSE
TO DEFENDANT'S FIRST MOTION TO
DISMISS [ECF 38]**

(First Request)

18 Plaintiffs Hillcrest Investments, Ltd. and Hillcrest Projects, LLC ("Plaintiffs"), by and
19 through their counsel of record, Mitchell S. Bisson, Esq., and Defendant Quail Valley Water District
20 ("Defendant"), by and through its counsel of record, Daniel N. Raytis, Esq. of Belden Blaine Raytis,
21 LLP (admitted *pro hac vice*), hereby jointly submit this stipulation and order to extend Plaintiffs'
22 deadline to file its Response to Defendant's Joinder in Defendant Chicago Title Insurance
23 Company's Motion to Dismiss; Defendant's Motion to Dismiss Under Federal Rules of Civil
24 Procedure 12(b)(6) for Failure to State a Claim; or in the Alternative, Defendant's Motion for a More
25 Definite Statement Pursuant to Federal Rules of Civil Procedure 12(E) (ECF No. 38, filed and served
26 on December 7, 2022), from December 21, 2022 to January 6, 2023.

27 /.../

28 /.../

Pursuant to meet and confer efforts by the Parties, including mutual stipulation reached by and through counsel of record for the Parties, this is a first and only request for an extension of Plaintiffs' Response and/or Opposition deadline. Plaintiffs and Defendant remain engaged in good faith resolution discussions and attempts to resolve this action. This Stipulation is for the purpose of facilitating efforts related thereto, as well as because Plaintiffs' counsel was out of the office for a week dealing with family medical issues and this stipulation is not intended to cause any delay or prejudice to any party. Nothing herein shall affect Defendant's right(s) to file and serve any necessary Reply to any Response and/or Opposition filed by Plaintiffs. All associated moving paper deadlines shall be reset pursuant to any extension ordered by the Court. This shall be a first and final request for extension of Plaintiffs' responsive pleading deadline, and no further request for extension thereof shall be filed with the Court.

Dated: December 21, 2022

BELDEN BLAINE RAYTIS, LLP

By: /s/ Daniel N. Raytis
 DANIEL N. RAYTIS
 Attorneys for Defendant Quail Valley
 Water District

Dated: December 21, 2022

THE LAW OFFICES OF MITCHELL
 S. BISSON

By: /s/ Mitchell S. Bisson
 MITCHELL S. BISSON, ESQ.
 Attorney for Plaintiffs

IT IS SO ORDERED:



[PROPOSED ORDER ON FOLLOWING PAGE]

RICHARD F. BOULWARE, II
 United States District Judge
 DATED this 27th day of December, 2022.

ORDER

Based upon the stipulation of the Parties, and good cause appearing,

IT IS SO ORDERED.

Dated this ____ day of December, 2022.